

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

KENDRA HARPER, individually and on
behalf of all others similarly situated,

CASE NO. 24-cv-644

Plaintiff,

v.

NBI, INC.,

Defendant.

JOINT MOTION TO CONTINUE STATUS CONFERENCE

Plaintiff Kendra Harper and Defendant NBI, Inc. move this Court to continue the status conference currently scheduled for March 21, 2025, to the week of April 7, 2025, and the deadline to file a Letter Brief to one week before the new date.

At the initial status conference on December 2, 2024, this Court stayed class-wide discovery and ordered the parties to file a joint letter updating the Court on the status of the case by March 3, 2025. The parties filed a joint letter on March 3, 2025, in which Plaintiff asked this Court to set a status hearing to address outstanding discovery disputes. This Court set a status hearing for March 21, with a deadline for the parties to file a Letter Brief in support of their positions by March 14, 2025. DE 30. This Court also ordered that the parties continue to work together to narrow the issues for the hearing. DE 30.

The parties have continued to work together and have come to some agreements that both parties hope will eliminate the need for court intervention. Defendant agrees to conduct additional searches, as discussed by the parties, and produce responsive documents by March 27, 2025. With respect to Plaintiff's Request for Production of Documents No. 8, Defendant agrees to tell Plaintiff

by March 19 whether it will withdraw its objection and produce any responsive documents by March 27, and/or which portions of the Request (if any) that Defendant is still objecting to.

Consequently, the parties move this Court to reset the status conference to the week of April 7, 2025, to allow Defendant time to produce any additional documents on March 27, and the parties to file Letter Briefs regarding the outstanding issues, if any. The parties believe this will narrow the issues the Court needs to address.

Dated: March 14, 2025

Respectfully submitted,

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